

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA

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EDWARD BROWN EL #201344  
Full name and prison number  
of plaintiff(s)

DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA.

CIVIL ACTION NO. 2:06-cv-1117-MEF  
(To be supplied by Clerk of  
U.S. District Court)

v. KENNETH SCOUNYER, CAPT.;  
STEPHAENE SCOTT, COUNSELOR; PATRICK  
BRANTLEY, COE; LINDA GLENN, COE; BRIAN  
MITCHELL, COUNSELOR; BOB RELEY,  
GOVERNOR; RICHARD ALLEN, COMMISSIONER  
GWENOLYN MOSELEY, WARDEN; ANTHONY ASKEW  
Name of person(s) who violated  
your constitutional rights.  
(List the names of all the  
persons.)

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES ( ) NO ( ☒ )
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES ( ) NO ( ☒ )
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) N/A

Defendant(s) N/A

2. Court (if federal court, name the district; if state court, name the county) N/A

3. Docket number N/A
4. Name of judge to whom case was assigned NEWT
5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) N/A
6. Approximate date of filing lawsuit N/A
7. Approximate date of disposition N/A

II. PLACE OF PRESENT CONFINEMENT Easterling CORR. FAC., 200 Wallace Drive, Clid, Alabama 36017

PLACE OF INSTITUTION WHERE INCIDENT OCCURRED Easterling Corr. fac. Alabama Department of Corrections

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

- | NAME                  | ADDRESS  |
|-----------------------|--|
| Brian Mitchell,       | 200 Wallace Drive, Clid, AL 36017                                  |
| 1. Stephanie Scott,   | 200 Wallace Drive, Clid, AL 36017                                  |
| Richard Allen,        | 361 South Ripley Street, P.O. Box 302405, Montgomery, AL 36130     |
| 2. Bob Riley,         | Alabama State Capitol, 11 South Union Street, Montgomery, AL 36130 |
| Patricia Brantley,    | 200 Wallace Drive, Clid, AL 36017                                  |
| 3. Linda Glenn,       | 200 Wallace Drive, Clid, AL 36017                                  |
| 4. Gwendolyn Moseley, | 200 Wallace Drive 36017  |
| 5. Anthony ASKEW,     | 200 Wallace Drive 36017  |
| 6. Kenneth Scounyer,  | 200 Wallace Drive 36017  |

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED 7-2-04; July 3, 2006 and Continuously

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: Defendants Riley, Allen, Moseley, Mitchell, Brantley, Glenn,

Scounyer acted in concert to violate my 8th and 14th Amend. U.S.C.A. Const. by Overcrowding, lack of security, health hazard situation, imminent danger, punitive segregation by housing me in a maximum security prison disguise as a level IV. Defendant Askew make a deliberate indifference between religious sects by refusing to grant Moorish science temple muslims the religious equal opportunity to have outside guest to come into the prison to bring food for Plaintiff religious gathering as Christians and other religious sects at Easterling is allowed to do.

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

The defendants herein have in fact acted in concert to violate my 8th and 14th Amendment rights of the United States Constitution to be free from the imminent danger of overcrowding lack of security, Health Hazard Situation. Defendant Anthony Askew has failed in his religious obligation to treat religious sects equally and unbiased, and not violate Plaintiff 1st Amendment.  
U.S.C.A. Const.

GROUND TWO: Malicious Prosecution, Failure to Follow Admin. Reg. #403,

Punitive Segregation in 6A and 5 dorm by defendants Brantley, Glenn and Scourner acting in concert to violate my 8th, 14th and 14th Amendment rights.

SUPPORTING FACTS: On June 19, 2006 Plaintiff was served a rule violation

from Admin. Reg. #403 Rule #38 Indecent Exposure. On 7-3-06 I was subsequently taken to a hearing by defendants and subsequently found guilty on strictly hearsay testimony with no evidence in support. Plaintiff was given 45 days in punitive segregated 6A & 5 dorms and defendant Scourner approved this violation on 7-5-06.

GROUND THREE: Defendants Scott Fail to Follow Crime Bill SAP Criteria

to treat inmates for substance abuse or drugs, but instead implement punishment on the punitive bases with inmates over inmates writing Rule Violations which undermined security.

SUPPORTING FACTS: Defendant Scott Fail to follow proper treatment

guidelines of Crime Bill SAP that does not place all inmates under the hands and authority of other inmates to extort the weaker inmates to be tricked out of their store goods to avoid criminals under the disguise of Peace Keepers or sit hours on a hard surfaced bench that cut off blood

Circulation, etc., Defendant Scott being a former security officer has brought punishment to Crime Bill instead of treatment. Coupled with arbitrary harassment in violation of Plaintiff 8th and 14th Amendment rights.

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

Plaintiff seek a trial by Jury, for Punitive treatment and deliberate indifference Plaintiff see 2 million dollars and that the punitive deliberate indifference of Plaintiff and his religious faith stop.

Edward Braum II

Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on 12-18-06  
(Date)

Edward Braum II

Signature of plaintiff(s)